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## *Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

HEAL THE BAY, INC. and SANTA MONICA  
BAYKEEPER, INC., et al.

Case No. 4:98-cv-4825 SBA

**STIPULATION RE: ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
CASES SHOULD BE RELATED**

**AND [PROPOSED]  
ORDER THEREON**

GINA McCARTHY, Administrator, United States Environmental Protection Agency, et al.,

### Defendants.

Plaintiffs Heal the Bay, Inc., Los Angeles Waterkeeper, Inc. (formerly known as Santa Monica Baykeeper, Inc.), Defendants United States Environmental Protection Agency, its Administrator, and the Regional Administrator of EPA Region 9, as well as Las Virgenes Municipal Water District – Triunfo Sanitation District, hereby stipulate and agree to request an Order pursuant to Local Civil Rule 3-12 to relate the above-captioned civil action with another case that was recently transferred to this district, *Las Virgenes Municipal Water District – Triunfo Sanitation District v. Gina McCarthy*, No. 4:14-cv-1392-PJH.

1 For the reasons set forth in the accompanying Administrative Motion to Consider  
2 Whether Cases Should Be Related, the parties believe that the elements of Local Civil Rule 3-12  
3 have been satisfied and that the *Las Virgenes* case and this case should be related.

4 April 4, 2014

5 /s/ Elizabeth Forsyth (with permission)  
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12 April 4, 2014

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22 April 4, 2014

23 /s/ Wayne K. Lemieux  
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27 *Attorney for Las Virgenes Municipal Water District  
28 – Triunfo Sanitation District Joint Powers Authority*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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Dated: 4/12/2014

*Jeanne B. Ormsby*  
UNITED STATES DISTRICT JUDGE